

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

AHMAD AKBAR,
a/k/a "Meech,"
TYRELL BEECHER,
a/k/a "Shae,"
CHRISTOPHER BOVAIN,
a/k/a "Cleko,"
WINNIS BRITO,
a/k/a "Flaco,"
DONTA DOUGLAS,
DARNELL GREEN,
a/k/a "Nellz,"
DOMINIQUE GREEN,
a/k/a "Domo,"
MAURICE HARGROW,
a/k/a "Moe Tally,"
CHARLES HEWITT,
a/k/a "Young Cee,"
KEVIN LEWIS,
a/k/a "Mula,"
JAMA MOHAMOUD,
a/k/a "JFK Jay,"
JAVIAN MOORE,
a/k/a "Julio,"
JORDAN RUSSELL,
a/k/a "J Rozay,"
JONATHAN SHORTT,
DEVON SMITH,
GEORGE THOMPSON,
LOUIS WILLIAMS, and
ISAIAH WISE FORDHAM,
a/k/a "ZayBands,"

Defendants.

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SEALED INDICTMENT

20 Cr.

COUNT ONE
(Conspiracy to Steal Government Funds)

The Grand Jury charges:

Overview of Postal Money Orders

1. United States Postal Service ("USPS") money orders can be purchased at any United States Post Office in any amount up to \$1000 U.S. dollars. Postal money orders contain a unique serial number that is pre-printed on each postal money order.

2. Prior to circulation, postal money orders are packaged in shrink-wrapped blocks containing 100 postal money orders in each wrapped package. These shrink-wrapped blocks of postal money orders are stored inside of a vault in each post office.

3. Postal money orders contain blank lines for the name and address of the sender, as well as the payee, of the postal money order. When a customer purchases a postal money order at a post office, the USPS clerk prints the date of purchase, post office code, a number identifying the clerk, and amount of the purchase on the postal money order. The customer fills in the name and address information for the sender and payee.

Overview of the Conspiracy

4. From at least on or about January 2019 up to and including the present, in the Southern District of New York and

elsewhere, AHMAD AKBAR, a/k/a "Meech," TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DARNELL GREEN, a/k/a "Nellz," DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," DEVON SMITH, GEORGE THOMPSON, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, and others known and unknown, conspired to defraud the United States by cashing postal money orders that had been stolen from post offices in Manhattan, the Bronx, Brooklyn, Queens, Long Island, New Jersey, and Arkansas.

5. In furtherance of the money order fraud scheme, members of the conspiracy obtained blank stolen postal money orders, occasionally still in the shrink-wrapped blocks containing 100 postal money orders. These stolen postal money orders lacked the date, post office code, clerk code, and amount printed by the USPS clerk at the time of a legitimate purchase.

6. To cash the blank stolen postal money orders, members of the conspiracy used computer software to mimic the legitimate USPS printing of date, post office code, clerk code, and amount on the stolen blank postal money orders.

7. Members of the conspiracy then cashed the altered stolen money orders at banks and post offices, using their own

names and identification, the names of third parties, or fake names. When members of the conspiracy used the names of third parties or fake names, the members of the conspiracy typically presented fraudulent identification bearing their own photograph but the personal information of a third party or fake personal identifying information.

8. The postal money orders cashed by the members of the conspiracy originated from 18 post offices. In total, more than 15,000 postal money orders have been stolen from those 18 post offices. At a face value of up to \$1000 per postal money order, the theft of postal money orders results in a potential loss to USPS of up to \$15 million.

Statutory Allegations

9. From at least on or about January 2019 up to and including the present, in the Southern District of New York and elsewhere, AHMAD AKBAR, a/k/a "Meech," TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DARNELL GREEN, a/k/a "Nellz," DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," DEVON SMITH, GEORGE THOMPSON, LOUIS WILLIAMS, and ISAAH WISE FORDHAM, a/k/a "ZayBands," the defendants, and others known and

unknown, willfully and knowingly did combine, conspire, confederate, and agreed together and with each other, to commit an offense against the United States, to wit, theft of government funds, in violation of Title 18, United States Code, Section 641.

10. It was part and object of the conspiracy that AHMAD AKBAR, a/k/a "Meech," TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DARNELL GREEN, a/k/a "Nellz," DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," DEVON SMITH, GEORGE THOMPSON, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, and others known and unknown, did embezzle, steal, purloin, and knowingly convert to their own use and the use of others, and without authority, did sell, convey, and dispose of records, vouchers, money, and things of value of the United States and a department and agency thereof, to wit, the United States Postal Service, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert it to their use and gain, knowing it to have been embezzled, stolen, purloined and converted, in violation of Title 18, United States Code, Section 641.

OVERT ACTS

11. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 12, 2019, AHMAD AKBAR, a/k/a "Meech," the defendant, personally cashed at least three stolen postal money orders, which had been stolen from a post office in Manhattan, at post offices in Newburgh, New York.

b. On or about May 6, 2019, TYRELL BEECHER, a/k/a "Shae," the defendant, personally cashed at least one stolen postal money order, which had been stolen from a post office in New York, New York, at a post office in Yonkers, New York.

c. On or about February 12, 2020, CHRISTOPHER BOVAIN, a/k/a "Cleko," the defendant, and a co-conspirator ("CC-1"), attempted to cash at least one stolen postal money order, which had been stolen from a post office in the Bronx, New York, at a post office in Kentucky by using a fraudulent Pennsylvania driver's license bearing BOVAIN's photograph but another individual's name.

d. On or about May 15, 2019, WINNIS BRITO, a/k/a "Flaco," the defendant, texted a photograph to KEVIN LEWIS, a/k/a "Mula," the defendant, depicting (1) a New Jersey identification card issued to "James Laven" featuring the photograph of BEECHER, and

(2) a stolen postal money order payable to "James Laven," which had been stolen from a post office in Manhattan.

e. On or about May 11, 2019, DARNELL GREEN, a/k/a "Nellz," the defendant, personally cashed at least one stolen postal money order, which had been stolen from a post office in Manhattan, at a post office in Manhattan.

f. On or about May 18, 2019, DOMINIQUE GREEN, a/k/a "Domo," the defendant, personally cashed at least one stolen postal money order, which had been stolen from a post office in Manhattan, at a post office in Manhattan.

g. On or about May 11, 2019, MAURICE HARGROW, a/k/a "Moe Tally," the defendant, personally cashed at least one stolen postal money order, which had been stolen from a post office in Manhattan, at a post office in Manhattan.

h. On or about May 1, 2019, CHARLES HEWITT, a/k/a "Young Cee," the defendant, sent text messages to LEWIS, JAMA MOHAMOUD, a/k/a "JFK Jay," the defendant, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendant, containing (1) a video of an individual fanning a large stack of \$100 bills and (2) the message, "All money order and I still have more to go."

i. On or about June 7, 2019, LEWIS personally deposited at least six stolen postal money orders, which had been stolen from

post offices in Manhattan and Brooklyn, New York, in his personal bank account.

j. On or about July 1, 2019, MOHAMOUD personally cashed at least two stolen money orders, which had been stolen from a post office in Arkansas, at a post office in New Jersey.

k. On or about April 30, 2019, JAVIAN MOORE, a/k/a "Julio," the defendant, texted LEWIS, asking for advice about how to falsify the amount printed on a money order, asking: "Show me how to cook up these MOS [t]he right way," to which LEWIS responded, "I don't cook em bro cee cooks [them]." MOORE replied to LEWIS, "Nah I'm doing them I'll figure it out I got 5 packs."

l. On or about October 11, 2019, JORDAN RUSSELL, a/k/a "J Rozay," the defendant, sent BOVAIN at least two photographs of attempts to mimic legitimate USPS printing that is applied when a customer purchases a postal money order. Bovain responded, "Those good bro."

m. On or about December 23, 2019, DEVON SMITH, the defendant, personally cashed at least two stolen postal money orders, which had been stolen from a post offices in the Bronx, New York, at post offices in New York.

n. On or about April 8, 2020, GEORGE THOMPSON, the defendant, and BRITO exchanged messages over a social media platform about attempts to cash money orders in Queens, New York.

o. On or about May 25, 2019, LOUIS WILLIAMS, the defendant, personally cashed at least two stolen postal money orders, which had been stolen from post offices in Manhattan, New York, at post offices in New York and New Jersey.

p. On or about March 11, 2019, WISE FORDHAM texted LEWIS a photograph of three shrink-wrapped packages of stolen postal money orders.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Conspiracy to Commit Bank Fraud)

The Grand Jury further charges:

Overview of the Check Conspiracy

12. From at least in or around January 2018, up to and including the present, in the Southern District of New York and elsewhere, TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DONTA DOUGLAS, DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," JONATHAN SHORTT, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, and others known and unknown, defrauded multiple national banks by recruiting collusive accountholders who allowed members of the conspiracy to

deposit fraudulent checks into their bank accounts and by withdrawing money from the collusive bank accounts after banks made available funds associated with the fraudulent check deposits to the account, but before the banks discovered that the checks were fraudulent and would not clear.

Statutory Allegations

13. From at least in or around January 2018, up to and including the present, in the Southern District of New York and elsewhere, TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DONTA DOUGLAS, DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," JONATHAN SHORTT, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

14. It was part and object of the conspiracy that TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DONTA DOUGLAS, DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK

Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," JONATHAN SHORTT, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, and others known and unknown, willfully and knowingly, would and did execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury further charges:

15. From at least in or about January 2019 up to and including the present, in the Southern District of New York and elsewhere, AHMAD AKBAR, a/k/a "Meech," JAMA MOHAMOUD, a/k/a "JFK Jay," and DEVON SMITH, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, AKBAR, MOHAMOUD, and SMITH used the names

and driver license numbers of other individuals during and in relation to the conspiracy to steal government funds charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

COUNT FOUR
(Aggravated Identity Theft)

The Grand Jury further charges:

16. From at least in or around January 2018, up to and including the present, in the Southern District of New York and elsewhere, TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DONTA DOUGLAS, DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," JONATHAN SHORTT, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, BEECHER, BOVAIN, BRITO, DOUGLAS, GREEN, HARGROW, HEWITT, LEWIS, MOHAMOUD, MOORE, RUSSELL, SHORTT, WILLIAMS, and WISE FORDHAM deposited fraudulent, forged, and/or altered checks using the banking information of third parties

during and in relation to the conspiracy to commit bank fraud charged in Count Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

FORFEITURE ALLEGATIONS

17. As a result of committing the offense alleged in Count One of this Indictment, AHMAD AKBAR, a/k/a "Meech," TYRELL BEECHER, a/k/a "Shae," CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DARNELL GREEN, a/k/a "Nellz," DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," DEVON SMITH, GEORGE THOMPSON, LOUIS WILLIAMS, and ISAAH WISE FORDHAM, a/k/a "ZayBands," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

18. As a result of committing the offense alleged in Count Two of this Indictment, TYRELL BEECHER, a/k/a "Shae,"

CHRISTOPHER BOVAIN, a/k/a "Cleko," WINNIS BRITO, a/k/a "Flaco," DONTA DOUGLAS, DOMINIQUE GREEN, a/k/a "Domo," MAURICE HARGROW, a/k/a "Moe Tally," CHARLES HEWITT, a/k/a "Young Cee," KEVIN LEWIS, a/k/a "Mula," JAMA MOHAMOUD, a/k/a "JFK Jay," JAVIAN MOORE, a/k/a "Julio," JORDAN RUSSELL, a/k/a "J Rozay," JONATHAN SHORTT, LOUIS WILLIAMS, and ISAIAH WISE FORDHAM, a/k/a "ZayBands," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

SUBSTITUTE ASSETS PROVISION

19. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

Christopher Bucco
DIT^y FOREPERSON

Audrey Strauss
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendants.

INDICTMENT

20 Cr.

(18 U.S.C. §§ 371, 1349, 1028A, and 2.)

AUDREY STRAUSS

Acting United States Attorney

Congelle Ducod
DTH Foreperson
